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*Attorneys for Defendants*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION

CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

DEFENDANTS LISTED ON EXHIBIT A ON  
NOVEMBER 29 ORDER,

Defendants.

**NOTICE OF REQUEST TO DEPOSE  
BERNARD L. MADOFF ON DAY TWO DEPOSITION TOPICS**

**PLEASE TAKE NOTICE**, that pursuant to the Order Authorizing the Deposition of

Bernard L. Madoff [Docket No. 14213] entered on November 29, 2017 (the “November 29

Order”), the Defendants represented by Dentons US LLP whose fact discovery had not closed prior to July 7, 2016 seek permission to depose Bernard L. Madoff (“Madoff”) on the following Day Two Deposition Topics, as defined in the November 29 Order, as they relate to each Defendant’s account:

1. The extent to which Madoff or Bernard L. Madoff Investment Securities LLC (“BLMIS”) bought, sold, and held actual securities shown on the customer statements from and after 1992 through December 2008.
2. The redacted FBI 302 recently produced by the Trustee.
3. The indemnification agreements Madoff had with the Four Families.
4. Interpretation of Madoff’s or BLMIS’s account records sent to customers, including the Defendants.
5. Day Two Deposition Topics listed by Helen Chaitman and Authorized Counsel for Participating customers.

Dated: May 30, 2017  
New York, New York

DENTONS US LLP

By: /s/ Carole Neville  
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